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July 22, 2025

VIA ECF

United States District Court
Eastern District of New York
Attn: Hon. Hector Gonzalez, U.S.D.J.
225 Cadman Plaza East
Courtroom 6A South
Brooklyn, NY 11201-1804

Re: Uribe v. Elahi LLC, *et ano.*
Case No.: 1:24-cv-7182 (CLP)
Defendants' Status Report on Discovery

Dear Judge Gonzalez:

This office represents the Defendants in the above-referenced case. Defendants respectfully submit this letter as a status report on discovery.

Your undersigned met with the individual Defendant, who is the principal of the corporate Defendant, today for a period in excess of two (2) hours. Defendants served Plaintiff today with their responses to: (i) Plaintiff's first request for the production of documents; (ii) Plaintiff's first set of interrogatories to the individual Defendant; and (iii) Plaintiff's first set of interrogatories to the corporate Defendant.

It is worthy to note that Plaintiff made a material misrepresentation to this Court in stating that Defendants failed to provide their Rule 26 disclosures. This is untrue. Defendants served Plaintiff with their Rule 26 disclosures on May 6, 2025.

Defendants are compiling all responsive documents in their possession, custody, and control, and anticipate making their production on or before Friday, July 25, 2025.

Defendants apologize for not completing discovery sooner. As this Court is aware, the individual Defendant was out of the country for an extended period of time, returning in June 2025, and your undersigned was thereafter occupied with, *inter alia*, an evidentiary hearing. Defendants did not seek to flout their discovery obligations nor willfully not comply; the circumstances were such that Defendants could not do so, and this was communicated to Plaintiff on July 7, 2025 during a telephonic conference.

Defendants thank this Court for its time and attention to this case.

Dated: Jamaica, New York
July 22, 2025

Respectfully submitted,
SAGE LEGAL LLC

/s/ Emanuel Kataev, Esq.

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